

Presentment Date: April 12, 2016  
Time: 9:15 A.M.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

VERONICA HOSKING,

CHAPTER 13

Debtor.

Case No. 14-35174(cgm)

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**NOTICE OF PRESENTMENT OF ORDER**

**PLEASE TAKE NOTICE**, that an *Order*, a true copy of which is annexed hereto, will be presented for signature to the Hon. Cecelia G. Morris, United States Bankruptcy Judge, on the 12th day of April 2016 at 9:15 A.M. in the Judge's Chambers, United States Bankruptcy Court, 355 Main Street, Poughkeepsie, New York, 12601.

**PLEASE TAKE FURTHER NOTICE**, that objections, if any, to the proposed Order must be made in writing and received in the Bankruptcy Judge's chambers and by the undersigned no later than three (3) days prior to the return date thereof, and unless objections are received by that time, the within order may be signed.

Dated: New Paltz, New York  
March 19, 2016

Law Office of Carol Richman, PLLC

By: /s/Carol Richman  
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UNITED STATES BANKRUPTCY COURT  
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**MOTION TO APPROVE FINAL LOAN MODIFICATION AGREEMENT**

The Debtor, Veronica Hosking, by her attorney Carol Richman, Esq. makes this motion pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure to approve a mortgage modification.

1. On July 8, 2104, the Debtor filed an Order Granting Loan Mitigation; such Order shows as entry No. 18 on the docket.

2. Pursuant to the Order, the secured creditor, Rushmore Loan Management Services, with the address of Attn: Michael O'Hanion, Director- 15480 Laguna Canyon Rd., Ste 100, Irvine, CA 92618, and the debtor fully executed a Final Loan Modification agreement (entitled "Loan Modification Agreement) for the condominium property located at 3 Hook Road, Apt 64D, Poughkeepsie, NY 12601, a copy of which is annexed hereto as **Exhibit A**.

3. The terms of the loan modification are as follows:

- a. the loan modification is dated March 10, 2016;
- b. all arrears are being re-capitalized into the loan;
- c. the principal balance under the modification is \$154,748.51 of which \$89,748.51 will be a non-interest bearing Deferred Principal Balance;
- d. the interest rate on the loan will 3.5% commencing March 1, 2016;
- e. the new maturity date of the loan is March 1, 2056 and

f. commencing April 1, 2016, the debtor will make a monthly payment of principal and interest due on the first day of each month in the amount of \$251.80 plus escrow for a total of \$370.76. Escrow is currently calculated to be \$118.96 per month, which may adjust at a later date. The Deferred Principal Balance of \$89,748.51 will be due on March 1, 2056 or upon earlier payoff of the loan.

6. The Debtor has voluntarily entered into the annexed Loan Modification Agreement and fully understands the terms and conditions set forth therein and believes that it is in her best interest.

7. Attached hereto as **Exhibit B** is a proposed order approving the loan modification.

**WHEREFORE**, it is respectfully requested that the Court enter an Order approving the Loan Modification Agreement, and that the debtor be granted such other and further relief as to the Court may seem just and proper.

Dated: New Paltz, New York  
March 19, 2016

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